REMARKS

Claims 1, 3-10, 12-19, and 21-27 are pending in the above-identified application. Claims 1, 3-8, 10, 12-17, 19, and 21-26 are rejected. Claims 9, 18, 27 are allowed, and Applicants thank the Examiner for the indication of allowability of these claims. No claims are added, canceled, or amended in this Amendment After Final.

I.   Objection To Drawings

The Examiner requested that Figures 1 and 2 be designated --RELATED ART-- because purportedly only that which is old is illustrated. Applicants have amended the drawings to provide the designations and, thus, respectfully request that this objection be withdrawn.

II.   35 U.S.C. § 103 Obviousness Rejection of Claims

Claims 1, 3-10, 12-19, and 21-27 are rejected under 35 U.S.C. § 103(a) as being unpatentable over allegedly admitted prior art (APA) on pages 1-7 of the present Application in view of *Bandhauer* "A zero generated code XPConnect proposal." Applicants respectfully traverse this rejection.

With respect to independent Claim 1 as amended, Applicants teach an Application Programming Interface (API) that includes, among other elements, a platform-independent plug-in API having a wrapper that is operably configured to connect the platform-independent plug in API to an intermediary for communication to a browser plug-in API. Applicants further teach and claim that the "wrapper includes a plurality of Interface Description Language (IDL) compliant interfaces, each IDL compliant interface being operably configured to connect a respective one of said platform-independent plug-in API interfaces to said intermediary."

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Independent claims 10 and 19 have similar limitations as claim 1 for the wrapper of the platform independent Plug-in API.

Contrary to the Examiner's assertion, *Bandhauer* fails to teach or suggest that a "wrapper includes a plurality of Interface Description Language (IDL) compliant interfaces." Indeed, *Bandhauer* does mention an IDL description: "the XPCOM interface described in the IDL description" (page 3, first full paragraph). However, *Bandhauer* does not disclose in any way that IDL compliant interfaces are included in a wrapper, as recited in claim 1. The InterfaceInfo files, which allegedly include IDL interfaces, and the wrapper objects are entirely different concepts (Compare page 2, "InterfaceInfo files and Objects" with page 3, "Proxies"). That is, the InterfaceInfo file containing an IDL description is not a wrapper, and thus *Bandhauer* does not teach that wrappers include IDL compliant interfaces. For at least this reason, *prima facie* obviousness has not been established.

Furthermore, even if *Bandhauer* taught or suggested the aforementioned limitations, there is no motivation to modify the alleged APA with *Bandhauer*. Applicants respectfully submit that the Examiner is applying the references in view of impermissible hindsight (See MPEP § 2142). For example, the Examiner contends that the proposed modifications would be obvious because "Bandhauer's wrapper would let the platform independent plug-in API communicate with the intermediary using a plurality of Interface Description Language (IDL) compliant interfaces to be compatible to enable the communication." This language in this reasoning largely mirrors the claim language and is unsupported by either *Bandhauer* or the alleged APA. Moreover, *Bandhauer* provides no advantage with regard to using IDL as communication was already enabled in the alleged APA via Pluglet Engine 210 (see Figure 2 of the original

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application). The only motivation for the Examiner's proposed combination is found in the

description of the advantages of the present invention. Thus, for at least this reason *prima facie*

obviousness has not been established.

Accordingly, Applicants respectfully request that the rejection to claims 1, 10, and be

withdrawn. Claims 3-8 depend from independent claim 1, claims 12-17 depend from

independent claim 10, and claims 21-26 depend from independent claim 19. Thus, each of the

dependent claims should be deemed allowable for at least the same reasons as given for claims 1,

10, and 19. Accordingly, Applicants respectfully request that the rejection to claims 3-8, 12-17,

and 21-26 be withdrawn.

III. Conclusion

In view of the above amendments and remarks, Applicant submits that all claims are

clearly allowable over the cited prior art, and respectfully requests early and favorable

notification to that effect.

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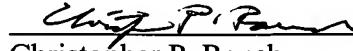
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